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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter 7 Estate
of Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN, and AUDREY
GOODMAN, individually, and in her capacity as
Personal Representative of the Estate of James M.
Goodman,

Defendants.

Hearing Date: September 20, 2023
Hearing Time: 10:00 a.m. (EST)
Objections Due: September 13, 2023

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05079 (CGM)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S
MOTION FOR SUMMARY JUDGMENT**

Irving H. Picard, trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. § 78aaa–III and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On August 22, 2023, the Trustee filed his motion for summary judgment (the “Motion”) in the above-referenced adversary proceeding (ECF Nos. 98–104).

2. Notice of the Motion was timely provided to defendants in the adversary proceeding and all parties that filed a notice of appearance in this case, pursuant to the Order Establishing Notice Procedures (Adv. Pro. No. 08-01789 (CGM) (Bankr. S.D.N.Y. Dec. 5, 2011), ECF No. 4560).

3. The deadline to file an objection to the Motion expired on September 13, 2023.

4. To date, counsel for the Trustee has not received an objection, responsive pleading, or request for a hearing with respect to the Motion. Counsel has reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, or responsive pleading with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of a proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: September 15, 2023
New York, New York

/s/ Nicholas J. Cremona

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